UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

GOOGLE LLC.

Plaintiff.

v.

Civil Action No.

DMITRY STAROVIKOV; ALEXANDER FILIPPOV; and Does 1-15.

Defendants.

FILED UNDER SEAL

MOTION FOR TEMPORARY RESTRAINING ORDER

Plaintiff Google LLC, by and through undersigned counsel, hereby moves this Court to enter a temporary restraining and asset freeze order against Defendants Dmitry Starovikov, Alexander Filippov, and Does 1 through 15, in accordance with Federal Rule of Civil Procedure 65. The proposed order is necessary to prevent Google, users of Google's products and services, and the public from suffering further and irreparable harm because of Defendants' acts. The grounds for this motion and order are set forth in the accompanying memorandum of law.

DATED: December 2, 2021

Respectfully submitted.

Laura Harris Andrew Michaelson Kathleen E. McCarthy

Matthew Bush

KING & SPALDING LLP

1185 Avenue of the Americas, 34th

Floor

New York, NY 10036 Telephone: (212) 790-5356 Fax: (212) 556-2222 lharris@kslaw.com amichaelson@kslaw.com kmccarthy@kslaw.com mbush@kslaw.com

Sumon Dantiki (pro hac vice to be submitted)
David P. Mattern (pro hac vice to be submitted)
KING & SPALDING LLP
1700 Pennsylvania Ave., NW, 2nd Floor Washington, DC 20006
Telephone: (202) 626-5591
Fax: (202) 626-3737
sdantiki@kslaw.com
dmattern@kslaw.com

Bethany L. Rupert (pro hac vice to be submitted)
KING & SPALDING LLP
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309
Telephone: (404) 572-3525
Fax: (404) 572-5100
brupert@kslaw.com

Counsel for Plaintiff Google LLC